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September 30, 2018

The Honorable Pamela K. Chen
U.S. District Judge
U.S. District Court for the Eastern District of
New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Juan Ángel Napout, et al.* – Docket No. 15-cr-252 (PKC) (RML)

Dear Judge Chen:

We write on behalf of the *Confederación Sudamericana de Fútbol* (“CONMEBOL”) to respectfully request that the Court allow CONMEBOL to submit invoices evidencing the legal fees included in its restitution request (ECF Dkt. Nos. 967, 986, 1013) within a reasonable time period after the Court has ruled on the question of precisely which fees are recoverable.

The Court is scheduled to hear restitution arguments from numerous interested parties on October 4, 2018, and a significant portion of the arguments will likely focus on interpreting the Mandatory Victims Restitution Act in light of the U.S. Supreme Court’s recent decision in *Lagos v. United States*, 138 S. Ct. 1684 (2018).¹ In particular, we anticipate the Court will rule on how closely the work of CONMEBOL’s outside counsel must have been linked to a request from the Government for information used to investigate or prosecute this case in order to be recoverable. Once the Court rules on that issue, CONMEBOL will be able to review and analyze the relevant invoices, identify the fees which the Court has ruled may be recoverable, and submit a revised and reduced restitution request supported by those invoices.

CONMEBOL respectfully submits that this proposal is the most reasonable and efficient approach at this stage. The question of which fees may be recoverable has been a moving target

¹ For clarity, CONMEBOL does not object to the interpretation of the MVRA offered by the Government in its filing of September 26, 2018.

quinn emanuel urquhart & sullivan, llp

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for months, and as evidenced by the various restitution submissions and responses, subject to dispute. Once the Court has ruled, CONMEBOL can know with certainty which portions of its invoices should be submitted, and can appropriately assume the burden of offering for review only the time entries that the Court has ruled may be recoverable, rather than having to provide 40 months worth of invoices with numerous entries that may well be irrelevant to the issue at hand. CONMEBOL can commit to providing a revised restitution request on legal fees with detailed support from its invoices no later than October 11, 2018, which would allow the Court and the parties nearly seven weeks to review this material prior to the Court's deadline for a final restitution order on November 20, 2018.

Very truly yours,
Quinn Emanuel Urquhart & Sullivan LLP

A handwritten signature in blue ink, appearing to read "Ben O'Neil", with a stylized flourish at the end.

Ben O'Neil
Tico Almeida

Attorneys for the Confederación Sudamericana de Fútbol

CC: All counsel of record (via ECF)